

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Ramir M. Hernandez, Esq.
5 Nevada Bar No. 13146
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, Nevada 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 rhernandez@wrightlegal.net
11 *Attorneys for Defendant, Bank of America, N.A.*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 NICOLE D. FOSS, an individual,

11 Plaintiff,

12 vs.

13 BANK OF AMERICA, N.A., a national
14 banking association; EQUIFAX
15 INFORMATION SERVICES, LLC, a foreign
16 limited-liability company; EXPERIAN
17 INFORMATION SOLUTIONS, INC., a foreign
18 corporation; TRANS UNION LLC, a foreign
19 limited-liability company,

20 Defendants.

Case No.: 2:21-cv-02157-JAD-DJA

**JOINT MOTION TO EXTEND
DEADLINE TO ANSWER**

(First Request)

21 Plaintiff, Nicole D. Foss (“Plaintiff”) and Defendant, Bank of America, N.A.
22 (“Defendant”), by and through their undersigned counsel, hereby move that Defendant shall have
23 up and including January 28, 2022, to answer or otherwise respond to Plaintiff’s complaint. The
24 parties request the additional time to continue to discuss settlement prior to Defendant filing an
25 answer or otherwise responding the complaint. This motion is filed in good faith and not intended
26 to cause delay. This is the parties’ first request of an extension of time to answer the complaint by
27 Defendant.

28 ///

///

1 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that
2 occurs during the pendency of this extension.

3 **IT IS SO STIPULATED.**

4
5 WRIGHT, FINLAY & ZAK, LLP

LAW OFFICE OF KEVIN L.
HERNANDEZ

6 */s/ Ramir M. Hernandez*

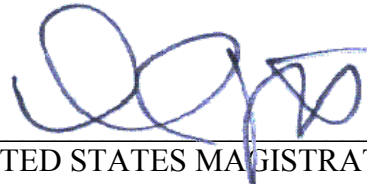
7 */s/ Kevin L. Hernandez*

8 Darren T. Brenner, Esq.
9 Nevada Bar No. 8386
10 Ramir M. Hernandez, Esq.
11 Nevada Bar No. 13146
12 7785 W. Sahara Ave., Suite 200
Las Vegas, Nevada 89117
Attorneys for Defendant, Bank of America,
N.A.

Kevin L. Hernandez, Esq.
Nevada Bar No. 12594
8920 W. Tropicana Ave., Suite 101
Las Vegas, Nevada 89147
Attorneys for Plaintiff Nicole D. Foss

13
14
15
16 **ORDER**

17 **IT IS SO ORDERED.**

18
19 

UNITED STATES MAGISTRATE JUDGE

20 DATED: December 22, 2021
21
22
23
24
25
26
27
28